

Ms. Vivian V. Kemp
45 Foreshore
London, United Kingdom, SE8 3AQ
+44 79 0646 1448
viv.millicent@gmail.com

July 21st, 2025

United States District Court
Southern District of New York
Pro Se Intake Unit
500 Pearl Street, Room 205
New York, New York
1007 - 1312

Civil Complaint –
United States District Court - Southern District of New York

Ms. Vivian V. Kemp

vs.

Mrs. Beyonce Knowles-Carter

Parkwood Entertainment
1412 Broadway,
New York, New York
10018
United States

Columbia Records

550 Madison Avenue, 24th Floor
New York, New York 10022
United States

Sony Music Entertainment
25 Madison Avenue
New York, New York
10010
United States

Case No. (unknown)

Dear Judge or Clerk,

I, Ms. Vivian V. Kemp, the undersigned Plaintiff, respectfully submit this Civil Complaint in accordance with the laws of New York, against Mrs. Beyonce Knowles-Carter, Parkwood Entertainment, Columbia Records and Sony Music Entertainment for the reasons outlined below.

I. Parties

1. Plaintiff: Ms. Vivian V. Kemp, an individual residing at 45 Foreshore, London, SE8 3AQ, United Kingdom.

2. The following defendants:

Defendant:

Mrs. Beyonce Knowles-Carter
an individual residing in New York City.

Defendant:

Parkwood Entertainment
an entity residing at
1412 Broadway,
New York, New York
10018
United States

Defendant:

Columbia Records

an entity residing at
550 Madison Avenue, 24th Floor
New York, New York 10022
United States

Defendant:

Sony Music Entertainment
an entity residing at
25 Madison Avenue
New York, New York
10010
United States

II. Jurisdiction and Venue

This Court has jurisdiction over this matter because federal law governs copyrights, and trademarks. Venue is proper in this Court because Parkwood Entertainment, Columbia Records and Sony Music Entertainment are located in Manhattan, New York City.

III. Factual Allegations

1. On or about 29 July 2022, the Defendant released the album Renaissance, which:

Infringed upon the Plaintiff's rights of intellectual property, including direct quotes from unpublished screenplays and private journals, use of media curated by the Plaintiff, as well as tone of voice. Also referencing materials that the Plaintiff has publicly shared, including curated content ('inspiration'), music, style references and social media posts.

Exposed trade secrets in terms of the Plaintiff's tone of voice, thought process and private or decommissioned media curation.

Presented the Plaintiff's tone of voice, thought process and private or decommissioned media curation in a false light, out of context, or in distorted ways.

Infringed upon the Plaintiff's Rights of Personality including portraying likeness of the Defendant in facial expression, voice and movement.

Infringed upon the Plaintiff's Rights of Privacy by referencing private and unreleased footage and documentation created by the Defendant including items such as unpublished writing, browsing activity, and intrusion into the Plaintiff's private affairs as well as public disclosure of embarrassing private facts. This includes references to items within the Plaintiff's private residence and references to footage taken within the Plaintiff's private residence.

Failed to financially remunerate the Plaintiff.

Failed to request permission to reference the Plaintiff, and/or use the Plaintiff's IP and/or the trade secrets of the Plaintiff.

Failed to credit the Plaintiff.

2. The influence of the Plaintiff upon the album Renaissance is apparent in the above and the Defendant's actions fit a pattern the Defendant has followed which extends back to 2003 of referencing and echoing the Plaintiff's media curation and creative direction. Oftentimes across previous albums, tours, etc the Defendant has - visually and musically - directly and indirectly referred to the above, up to and including life events, and at times even the Plaintiff's location. For example, the staging and styling of the live performance of "Drunk in Love" in 2014 at the Grammy Awards bears a striking resemblance to the Plaintiff's former apartment and building in London.

3. As a result of the Defendant's actions, the Plaintiff suffered the following damages.

Emotional distress
Loss of opportunity
Financial loss
Loss of wages
Loss of value to personal brand
Loss of social capital
Loss of security*

*Loss of Security

Beyonce has a famously supportive and loyal fan base who have been known to attack people she does not like or who are perceived to have upset her. As a mild example, leaving bees on the social media profiles of people.

IV. Claims for Relief

1. Count I - Intellectual Property

The Defendant has used the Plaintiff's intellectual property.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

2. Count II - Trade Secret Misappropriation

The Defendant has misappropriated the Plaintiff's trade secrets.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

3. Count III - Right to Personality

The Defendant has violated the Plaintiff's Right to Personality.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

4. Count IV - Invasion of Privacy

The Defendant has invaded the Plaintiff's privacy.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

5. Count V - False Light

While not defamatory, many of the Defendant's chosen references present the Plaintiff in a false light, and could potentially distort the perception of the Plaintiff given the Defendant's platform.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

6. Count VI – Negligence: The Defendant acted negligently by at times intimating that she does not like the Plaintiff, resulting in indirect potential harm or injury to the Plaintiff's social standing due to her platform and fan base.

As a result of this, the Plaintiff has suffered: Emotional distress, Loss of opportunity, Financial loss, Loss of wages, Loss of value to personal brand, Loss of social capital and Loss of Security.

V. Damages

The Plaintiff seeks the following relief:

1. Compensatory damages in the amount of £600 million.
2. Punitive damages in the amount of creative credit and a percentage of residuals to be negotiated due to the Defendant's actions.
3. Treble damages because this is a pattern.

VI. Prayer for Relief

WHEREFORE, the Plaintiff respectfully requests that this Court:

1. Award judgment in favor of the Plaintiff for the full amount of damages sustained.
2. Grant any other relief the Court deems just and proper.

Respectfully submitted,
Ms. Vivian V. Kemp